

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Fig. 3. This sheet, which includes Fig. 3, replaces the original sheet including Fig. 3.

Attachment: Replacement Sheet(s)
Annotated Sheet Showing Changes

REMARKS/ARGUMENTS

Reconsideration and allowance of the subject patent application is respectfully requested. Claims 1-28 are currently pending. By this Amendment, claims 23-28 are canceled without prejudice or disclaimer. In addition, the specification and claims 1, 5, 6, 8, and 10-16 have been amended in accordance with the Examiner's suggestions to correct missing antecedents, minor inconsistencies and to more particularly point out and distinctly claim Applicants' invention. The Title Of The Invention has been replaced with a new Title which is more clearly indicative of applicants' claimed invention. A replacement drawing sheet in compliance with 35 CFR 1.121(d) is provided to overcome the Examiner's objections regarding clarity and reference numerals. No new matter has been added to the drawings or specification.

Applicants will provide a supplemental Declaration to correct a minor typographical error in the designation of Michael B. House's (Inventor No. 2) citizenship.

The properly executed supplemental inventor's Declaration for Mr. House in compliance with 37 CFR 1.67(a) will be forwarded to the U.S. Patent and Trademark Office no later than payment of the issue fee.

Claims 1-3, 9-11, 16-19, 21 and 22 stand rejected under 35 U.S.C. §102(e) as being anticipated by Petrie et al. (U.S. Patent 6,882,904). This rejection is respectfully traversed. The Petrie et al. '904 patent discloses a communications system for managing a *plurality* of dispersed electrical power resource assets (i.e., a "micro-grid") *from a central control center*. Although some of the power resource assets mentioned by Petrie et al. may include gas turbine power generators, the Petrie '904 patent is primarily directed toward connecting such dispersed power resources "into a an

intelligent optimized system *that operates as an automated single power plant* capable of producing the aggregated load of the individual component power generators and storage units." (emphasis added) (Petrie et al. '904 patent Summary Of The Invention at column 3, lines 51-54.)

In contrast, applicants' independent claims 1, 10 and 16 are directed toward a system and method for the digitization of field engineering work processes (i.e., "in-the-field" or on-the-site monitoring, testing, calibrating, remote controlling, etc. of machinery and equipment operations by a field engineer working away from the control center) at a gas turbine power plant. See, for example, applicants' specification at page 2, paragraphs 4 and 5, and in particular, applicants' specification at pages 3-5, paragraphs 7 through 11. In contrast to applicants' claimed invention, Petrie et al.'s invention is directed toward managing a plurality of resources from a *single central control center*. For, example, Petrie et al. fail to teach or disclose a system for digitization of field engineering work processes in a gas turbine power plant, or an antenna assembly having a transceiver system for transmitting and receiving signals from at least one wireless communications interface device or receiving power plant data by a controller for a gas turbine, as set forth in one or more of applicants' independent claims 1, 10 or 16. Consequently, the Petrie et al. '904 patent does not anticipate claims 1-3, 9-11, 16-19, 21 and 22 because it does not disclose every element of the claimed invention. See Lewmar Marine, Inc. v. Barient, Inc., 3 U.S.P.Q. 2d 1766 (Fed. Cir. 1987).

Claims 1-6 and 9-26 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Bjorklund (U.S. Pub 2001/0107615). This rejection is likewise traversed for at least the same reasons as set forth above with respect to the Petrie et al.

reference. The Bjorklund '615 publication is directed toward a control system for an *electrical substation* and does not teach or disclose, a system for digitization of field engineering work processes in a *gas turbine power plant*, or an orbiting satellite antenna assembly having a transceiver system for transmitting and receiving signals from at least one wireless communications interface device, or a method for controlling a gas turbine power plant by a mobile user, or receiving power plant data by a controller for a gas turbine, as set forth in one or more of applicants' independent claims 1, 10 or 16.

Consequently, the Bjorklund '615 publication does not anticipate claims 1-6 and 9-26 because it does not disclose every element of the claimed invention. See Lewmar Marine, Inc. v. Barient, Inc., 3 U.S.P.Q. 2d 1766 (Fed. Cir. 1987).

Claims 4-8, 12-15 and 20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Petrie et al. ('904) in view of Perkins et al. (U.S. Patent 6,496,477). This rejection is respectfully traversed. Claims 4-8, 12-15 and 20 are dependent on claims 1, 10 or 16 and since neither Petrie et al. nor Perkins et al. suggest the specific features or steps as discussed above and set forth in applicants' independent claims 1, 10 or 16, it is respectfully submitted that dependent claims 4-8, 12-15 and 20 are patentable over the combined teachings of these references.

Moreover, when a rejection depends on a combination of prior art references, there must be some teaching, suggestion, or motivation to combine the references. See *In re Geiger*, 815 F. 2d 686, 688, 2 USPQ2d 1276, 1278 (Fed. Cir. 1987).

No references have been cited that provide a factual basis for the conclusion of what is alleged in the Office Action as being obvious, i.e., no teaching has been provided that suggests the obviousness of modifying the communications network of

Petrie et al. to contain a PBX or a VOIP gateway or an ATM network or orbiting satellite communications, etc. as claimed. Applicants respectfully contend that even if Petrie et al. and Perkins et al. could be considered "analogous art", as alleged in the Office Action, that alone would not be sufficient motivation to combine the references. Thus, the Office Action sets forth a conclusion of obviousness, not a reason supporting the alleged obviousness of the claimed invention. It is axiomatic that the PTO has a burden under §103 to establish a prima facie case of obviousness. See *In re Piasecki*, 745 F.2d 1468, 1471-72, 223 USPQ 785, 787-88 (Fed. Cir. 1984).

Applicants respectfully contend that the Office Action improperly relies on hindsight reconstruction of the claimed invention based on the teachings of the instant application in reaching its obviousness determination. "To imbue one of ordinary skill in the art with knowledge of the invention, when no prior art reference or references of record convey or suggest that knowledge, is to fall victim to the insidious effect of a hindsight syndrome wherein that which only the inventor taught is used against its teacher." See *W.L. Gore & Assoc. v. Garlock, Inc.*, 721 F.2d 1540, 1543, 220 USPQ 303, 312-13 (Fed. Cir. 1983). Only in view of the teachings of the instant application could the rejections possibly be maintained.

In view of Applicant's foregoing remarks, it is believed that the application is in condition for allowance. Favorable consideration and allowance of this application are respectfully solicited. If any small matter remains outstanding, the Examiner is encouraged to telephone Applicants' representative at the telephone number listed below or on the following page.

Respectfully submitted,

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